

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF
TEXAS HOUSTON DIVISION**

In re. P.C.F. Properties in TX, LLC
Plaintiff

vs

CIV No. 24cv4357

James M. Andersen, Elizabeth Thomas
 Jasmine B .Jarbis, Jireh Pitts, and
 Monique Moore et al.

ADV. No. 24-03216

Defendants

APPELLANTS DESIGNATION OF ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure and Rule 8006-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Southern District of Texas Elizabeth Thomas (the “Appellants”) respectfully submits the following designation items to be included in the record on appeal.

Docket No.	Date	Title of Pleadings
2	10/15/2024	Amended Notice of Removal
3	10/15/2024	State Court Documents
5	10/18/2024	Motion to Remand
6	10/21/2024	Show Cause Order
10	11/01/2024	Ex Parte Motion for Withdrawal of Reference.
11	11/01/2024	Motion for Continuance
13	11/04/2024	Amended Order to Show Cause

APPELLANTS STATEMENT OF ISSUES ON APPEAL

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure and Rule 8002 Appellants Elizabeth Thomas submits that the following but not limited to issues to be raised on appeal:

1. Whether the Bankruptcy Court erred in finding that it had subject matter jurisdiction?
2. Whether the Bankruptcy Court had jurisdiction despite the lack of any of the parties being in bankruptcy?
3. Whether the Bankruptcy Court erred in finding it has jurisdiction over a entity P.C.F. Properties in TX, LLC., that lacks a legal existence ?
4. Whether the Bankruptcy Court granting of a continuance had the effect of denying the Appellant her due process rights to be heard.

Certificate Regarding Transcripts

Pursuant to Rule 8009(b)(3) of the Federal Rules of Bankruptcy Procedure, Appellants hereby files this certificate stating that Appellants has not placed a order for any transcripts designated available on the Court's docket.

Dated: November 14, 2024.

Sincerely,

By Permission /s/Elizabeth Thomas

Elizabeth Thomas Pro, Se
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Washington DC 20002
elizthomas234@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2024, a true and correct copy of the foregoing instrument has been served by electronic transmission via the Court's CM/ECF system upon all parties registered to receive electronic notice in this bankruptcy case.

By Permission /s/Elizabeth Thomas